



April 10, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

RE: Request for Waiver of Form 471 Filing Deadline for Funding Year 2019
CC: Docket 02-6

Contact:

Jill Leavenworth, President
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FCC Form 471 Application #: See List Below

Dear Ms. Dortch,

I am writing to respectfully request that the FCC grant a waiver of the Funding Year 2019 Form 471 filing deadline and allow the following Forms 471 to be considered as having been filed within the Filing Window:

APPLICANT NAME	BEN	471 #	FILED
AOS 98-RCSS	16061258	191041572	3/28/19
Derry Co-op School District	120867	191041585	3/28/19
Economics Opportunities Council of Indian River County	16040691	191041583	3/28/19
Laraway Youth & Family Services	209312	191041591	3/28/19
Riverdale School District	122847	191041620	3/29/19
Riverdale School District	122847	191041621	3/29/19
School Administration Unit 101	17014504	191041579	3/28/19
Westford Public Schools	120408	191041587	3/28/19
Winchester School District	121085	191041581	3/28/19

As the amount of available E-Rate reimbursements drop for many applicants, a number of our clients chose to file their own Forms 471 this year. In accordance with their wishes, we moved forward and planned our workload relative to the final days of the 2019 471 Filing Window. There were, however, eight (8) applicants that contacted us at the very end of the Filing Window period to request that we file draft the Forms 471 for them after all.

Each of these applicants had run into delays for various reason. In one case, the district Superintendent left abruptly, on the Friday before the Filing Window closed. He was an integral part of the team making service provider selections. Due to this unplanned staff change, the district needed an additional 48 hours to make themselves familiar with the proposed projects, review and evaluate the bids that had been received. The Form 471 was ultimately filed on Friday, March 29, 2019.

Another applicant suffered the death of their Technology Director just 14 days prior to the close of the Filing Window. The Director of Finance & Operations had to step in to the process, evaluate bids for a complex technology upgrade at multiple schools, and sign contracts before the Filing Window closed. The important steps that precede the filing of Form 471 quickly became far more time consuming than anticipated.

In some cases, applicants were unable to log in to EPC on March 27th. Those applicants called us in a panic. Other applicants managed to create a Form 471 but found that during peak use of EPC it was corrupted and could not be re-opened. Deleting those forms and starting over caused significant delay for those with complicated forms.

As we know, EPC slows down on the final days of the Filing Window due to higher than usual demand. We endeavored to draft these additional nine (9) Forms 471 on behalf of applicants. However, as we worked steadily to complete these projects, our office lost power and it was not restored until later that evening.

The applicants listed on this request appreciate and rely on the reimbursements they have received through the program in the past. One of them is a first-time applicant desperately hoping to be able to upgrade their WIFI infrastructure. I respectfully request that the FCC consider these circumstances beyond our control as a reason to grant our request for waiver.

We realize the that previous precedent is for the Commission to grant Form 471 deadline waiver requests if the Form 471 was submitted within 14 days of the Form 471 deadline¹. In light of the reasons stated above, we respectfully request that the FCC view these extenuating circumstances as good cause to waive the Form 471 deadline for the applications listed on Page 1 of this Request for Waiver.

Respectfully submitted,



Jill Leavenworth
President

¹ *Request for Waiver and Review of Decisions of the Universal Service Administrator by the Academy of Math & Science et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 25 FCC Rcd 9256, 9259, para. 8 (2010) (Academy of Math & Science Order).